

RBT

- Waste last received Jan 25, 83.
- Depends on local domestic wells to satisfy D105.
 - Too far away
 - Water levels never checked
 - samples collected after pneumatic tanks & filter
 - signs of waste constituents?
- Closure ok except handling of leachate (in drain), gov.
- Part B requested 4/9/83.
- K001 waste
 - The closure design appears to be sound except for the handling of leachate from the toe drain system, the poor gov detection system, the potential for cracks at the periphery of the cover system, and questions about the complete removal of waste and waste residues from the old units.

What were the old units?

I thought this was a landfill?
why must there be removal?



265 violations

- detection monitoring
- financial assurance
- certification of closure?

there are 3 down, 1 up, all domestic

does not address: AWNI network design

+ CIC

lined, capped and monitored landfill 176' x 170'
EPA's comments on the RBT July 15, 1983 draft
c/lpc. plan in letter to Eric Eggers from
KDF Aug 10, '83.

- financial - Chance asked for it by 9/1/85.
- what was WNGE Order DE 83-468. (Oct 20, 1983)
Notice of Penalty DE 83-284 (June 20, 1983)

Chance say: "no significant increase
of downgradient water quality parameters
over background values."

Violations

265.910 (j)(1) must maintain the function and integrity of the final cover as specified in the approved closure plan

265.145 an o/o ~~responsible~~ of each disposal facility must establish financial assurance for post-closure care of the facility.

"The tie drain (distribution box, Option III) will be sampled and analyzed on the same schedule and for the same parameters as the lysimeters and wells.

~~See~~ WDOE approved (w/o public notice) the C/LPC plan on Oct 26 1983 (by order).